## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 Wave 12: MDL 2327

THIS DOCUMENT RELATES TO:

Cases Listed in Plaintiffs' Exhibit A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO DAUBERT MOTION TO EXCLUDE EXPERT TESTIMONY OF JOYCE LOWMAN, M.D.

In response to Plaintiffs' notice adopting their prior *Daubert* motions as to Joyce Lowman, M.D. (Doc. 8730 (adopting Docs. 2061, 2067, 2449, 2452, 2613)), Defendants hereby adopt and incorporate by reference their prior responsive briefing (Docs. 2161 & 2519) in opposition to the motion to exclude her testimony. Defendants respectfully request that the Plaintiffs' motion be denied for the reasons stated in the prior briefing.

This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street

Suite 1380 (25301) P.O. Box 3824 Charleston, WV 24338 (304) 414-1800 srobinson@tcspllc.com

COUNSEL FOR DEFENDANTS ETHICON, INC., AND JOHNSON & JOHNSON

## **CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

<u>/s/ William M. Gage</u> COUNSEL FOR DEFENDANTS